

LITE DEPALMA GREENBERG, LLC

Joseph J. DePalma (JD-7697)

Two Gateway Center, Suite 1201

Newark, New Jersey 07102

Tel: (973) 623-3000

Fax: (973) 623-0858

jdepalma@litedepalma.com

Attorneys for Plaintiffs Karen Pekelney and Mark Meisel

Proposed Liaison Counsel

[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

COURTNEY DIANA, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

HORIZON HEALTHCARE SERVICES,
INC., d/b/a HORIZON BLUE CROSS BLUE
SHIELD OF NEW JERSEY, a New Jersey
corporation,

Defendant.

Case No. 2:13-cv-07418-CCC-MF

KAREN PEKELNEY and MARK MEISEL,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

HORIZON HEALTHCARE SERVICES,
INC., d/b/a HORIZON BLUE CROSS BLUE
SHIELD OF NEW JERSEY, a New Jersey
corporation,

Defendant.

Case No. 2:14-cv-00584-CCC-MF

**Motion Returnable: March 17, 2014
Oral Argument Requested**

**NOTICE OF MOTION OF PLAINTIFFS KAREN PEKELNEY AND MARK MEISEL
TO CONSOLIDATE CASES AND APPOINT INTERIM LEAD CLASS COUNSEL AND
LIAISON COUNSEL**

To: All Counsel of Record

PLEASE TAKE NOTICE that on March 17, 2014, at 9:00 a.m. or as soon thereafter as counsel may be heard, the attorneys for Plaintiffs Karen Pekelney and Mark Meisel in the above-captioned action shall respectfully move before the Honorable Claire Cecchi, U.S.D.J. at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Courtroom 2B, Newark, NJ 07101, for an order consolidating the above-captioned actions pursuant to Fed. R. Civ. P. 42(a). Plaintiffs will also move pursuant to Fed. R. Civ. P. 23(g) to appoint Kaplan Fox & Kilsheimer LLP as Interim Lead Class Counsel and Lite DePalma Greenberg, LLC as Liaison Counsel.

PLEASE TAKE FURTHER NOTICE that Plaintiffs Karen Pekelney and Mark Meisel rely on the accompanying Memorandum of Law in Support of Motion of Plaintiffs Karen Pekelney and Mark Meisel to Consolidate Cases and Appoint Interim Lead Class Counsel and Liaison Counsel as well as the Declaration of Joseph J. DePalma. A proposed form of Order is also submitted herewith.

Dated: February 10, 2014

Respectfully submitted,

/s/ Joseph J. DePalma

Joseph J. DePalma (JD-7697)
LITE DEPALMA GREENBERG, LLC
Two Gateway Center, Suite 1201
Newark, NJ 07102
Tel: (973) 623-3000
Fax: (973) 623-0858
jdepalma@litedepalma.com

*Attorneys for Plaintiffs Karen Pekelney and
Mark Meisel
Proposed Liaison Counsel*

Robert N. Kaplan
David A. Straite (DS6793)
Lauren I. Dubick
KAPLAN FOX & KILSHEIMER LLP
850 3rd Avenue, 14th Floor
New York, New York 10022
Telephone: (212) 687-1980
Facsimile: (212) 687-7714
rkaplan@kaplanfox.com
dstraite@kaplanfox.com
ldubick@kaplanfox.com

Laurence D. King
KAPLAN FOX & KILSHEIMER LLP
350 Sansome Street, Suite 400
San Francisco, CA 94104
Telephone: (415) 772-4700
Facsimile: (415) 772-4707
lking@kaplanfox.com

*Attorneys for Plaintiffs Karen Pekelney and
Mark Meisel
Proposed Interim Lead Class Counsel*